

**UNITED STATES DISTRICT COURT  
IN THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

HENRY HILL,

Plaintiff,

v.

TODD A. RUCK, INC. and  
SADE MOHAMED ABDULLAH,

Defendants.

CIVIL ACTION FILE NO.

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**NOTICE OF REMOVAL**

Defendants TODD A. RUCK, INC. and SADE MOHAMED ABDULLAH, pursuant to 28 U.S.C. § 1446, hereby file this notice of removal of the civil action now pending in the State Court of Clayton County, State of Georgia, Civil Action File No. 2020CV01291, styled as *Henry Hill v. Todd A. Ruck and Sade Mohamed Abdullah* (the “civil action”), respectfully showing this Honorable Court as follows:

1. On July 14, 2020, Plaintiff HENRY HILL (“Plaintiff”) filed the civil action in the State Court of Clayton County, State of Georgia. A copy of the Summons and Complaint are attached hereto collectively as “Exhibit A.”
2. In the civil action, Plaintiff pursues causes of action for negligence, vicarious liability, and negligent hiring, training, & supervision arising out of a July 18, 2018, motor vehicle accident. (Complaint ¶¶ 6, 14, 26, 28).

3. In the civil action, Plaintiff seeks general and special damages, in addition to all other damages allowable under Georgia law. Plaintiff also claims bad faith damages including costs and attorneys' fees. (Complaint, generally)
4. Plaintiff's Complaint does not include a prayer for a specific amount of damages. However, on September 1, 2019, counsel for Plaintiff submitted a pre-suit demand pursuant to O.C.G.A. § 9-11-67.1 offering to resolve Plaintiff's claims for an amount of many multiples of the \$75,000 jurisdictional threshold.
5. Based on the allegations in Plaintiff's Complaint and Plaintiff's pre-suit demand seeking many multiples of the \$75,000 jurisdictional threshold, Defendants aver in good faith that the amount in controversy in this civil action well exceeds \$75,000.00 exclusive of interest, costs, and attorney's fees and therefore the amount in controversy requirement of 28 U.S.C. §§ 1332(a), 1441(b) is satisfied.
6. At all times material, Plaintiff is a citizen of the State of Georgia. (Complaint ¶ 1).
7. At all times material, Defendant TODD A. RUCK, INC. is organized under the laws of the State of Ohio with its principal place of business in the State of Ohio. (Complaint ¶ 2).

8. At all times material, Defendant SADE MOHAMED ABDULLAH is a citizen of the State of Ohio. (Complaint ¶ 3).
9. Because the civil action is between citizens of different states, removal on the basis of diversity should be allowed pursuant to 28 U.S.C. §§ 1332(a), 1441(b).
10. The civil action was commenced in the State Court of Clayton County, State of Georgia on July 14, 2020. The Registered Agent for Defendant TODD A RUCK, INC. was served with a copy of the Summons and Complaint on August 25, 2020. And Defendant SADE MOHAMED ABDULLAH was likewise served with a copy of the Summons and Complaint on August 25, 2020.
11. Accordingly, this notice of removal is timely filed pursuant to 28 U.S.C. § 1446(b)(1) and Fed. R. Civ. P. 6(a)(1)(C).
12. Pursuant to 28 U.S.C. § 1446(d), Defendants have provided written notice to all adverse parties and has filed a copy of this Notice of Removal with the Clerk of the State Court of Clayton County, State of Georgia (A copy of the Notice of Filing of Notice of Removal submitted to the Clerk of the State Court of Clayton County, State of Georgia is attached hereto as “Exhibit B”).

WHEREFORE, Defendants TODD A. RUCK, INC. and SADE MOHAMED ABDULLAH respectfully submit this matter to this Court's jurisdiction and remove this civil action to this Court.

This 16th day of September, 2020.

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**CERTIFICATE OF SERVICE**

This is to certify that I have this 16th day of September, 2020, caused the within and foregoing **Notice of Removal** to be served on all parties by US Mail with adequate postage affixed and by using the E-File/CM/ECF electronic filing system which will automatically send electronic notification of such filing to the following:

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